

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**ACCESS 4 ALL, INC., A FLORIDA NOT
FOR PROFIT CORPORATION AND FELIX
ESPOSITO, INDIVIDUALLY,**

PLAINTIFFS,

V.

**GSH LODGING, LLC, A DELAWARE
LIMITED LIABILITY COMPANY,**

DEFENDANT.

CIVIL ACTION NO. 04-12238 JLT

RECEIVED
RECEIPT # 661687
AMOUNT \$ 32.00
1/21/05 JN

ASSENTED TO MOTION FOR LEAVE TO APPEAR PRO HAC VICE

The undersigned, local counsel for GSH Lodging, LLC ("Defendant"), a member of the bar of this Court, hereby requests, pursuant to Local Rule 83.5.3, that Patrick C. Summers be permitted to appear as counsel for Defendant and practice in this Court *pro hac vice*.

As grounds therefore, local counsel states as follows:

1. Mr. Summers has a prior attorney/client relationship with Defendant.
2. As set forth in the attached Certificate, Mr. Summers meets the requirements for admission *pro hac vice* in this action.
3. Plaintiffs' counsel has assented to this motion.

WHEREFORE, GSH Lodging, LLC respectfully requests that an Order be entered permitting Patrick C. Summers to appear *pro hac vice* on behalf of GSH Lodging, LLC in this action.

Assented to:

ACCESS 4 ALL, INC., and FELIX ESPOSITO,

By their attorney,

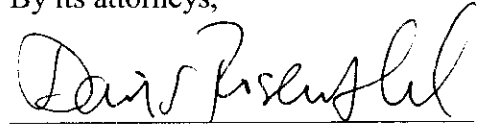
O. Oliver Wragg, IV, Esq.
Fuller, Fuller & Associates, P.A.
12000 Biscayne Blvd., Suite 609
North Miami, Florida 33181
Telephone: (305) 891-5199

Dated: January 19, 2005

Respectfully submitted,

GSH LODGING, LLC,

By its attorneys,



David S. Rosenthal (BBO# 429260)
NIXON PEABODY LLP
101 Federal Street
Boston, MA 02110-1832
(617) 345-1300

LR 7.1 CERTIFICATION

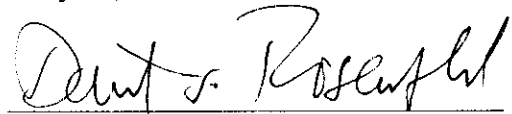
I hereby certify that counsel for the parties have conferred in good faith and Plaintiffs' counsel has agreed to assent to this motion.



David S. Rosenthal

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record of each party by first class mail on January 19, 2005.



David S. Rosenthal